

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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**IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

**MDL No. 17-2795 (MJD/KMM)**

**DECLARATION OF BRYAN KOCH  
REGARDING MAILING OF CAFA  
NOTICE**

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I, Bryan Koch, hereby declare as follows:

I am an attorney at Cooley LLP. I have personal knowledge of the following facts and, if called to testify as a witness, I could and would testify as follows:

1. On February 9 and February 11, 2021, Cooley LLP sent notifications of the proposed settlement in this case pursuant to the Class Action Fairness Act, 28 U.S.C. § 1715, to the Attorneys General for all 50 U.S. states, the District of Columbia, the Virgin Islands, Guam, and the Northern Mariana Islands, the Secretary of Justice for Puerto Rico, and the U.S. Attorney General. Cooley LLP sent the notices via Priority Mail through the U.S. Postal Service and via Priority Overnight and/or International Priority through FedEx.

2. Each notice included copies of the Consolidated Class Action Complaint and Plaintiffs' Motion for Preliminary Approval of the proposed settlement and the supporting memorandum and documents, including the Stipulation and Agreement of

Settlement, and the Proposed Notice, Proof of Claim and Release Form, and Summary Notice. In addition, Cooley LLP offered to provide a set of all pleadings, including the complaints filed prior to consolidation in this case, via CD or SFTP.

3. The notices as sent are attached as Exhibit 1.

4. As of the date of this declaration, Cooley LLP has received a response from the state of Washington, confirming receipt of the notice. This response is attached as Exhibit 2. Cooley LLP has not received any other response to the notice from the recipients identified above.

I hereby declare under the penalty of perjury that the foregoing is true and correct.

Executed this 13th day of July, 2021, in Newton, MA.

/s/ Bryan Koch  
Bryan Koch

# EXHIBIT 1



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Steve Marshall  
Alabama Attorney General  
501 Washington Ave.  
Montgomery, AL 36104  
(334) 242-7300

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

| Case Name  | Original Case No. | Original Court                     | D. Minn. Case No. |
|--|-------------------|------------------------------------|-------------------|
| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn. (MDL Proceeding) | MDL No. 17-2795   |
| <i>Craig v. CenturyLink, Inc.</i>                                  | 18-cv-00296       | U.S.D.C. S.D.N.Y.                  | 0:18-cv-0296      |
| <i>Scott v. CenturyLink, Inc.</i>                                  | 3:17-cv-01005     | U.S.D.C. W.D. La.                  | 0:18-cv-0297      |
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| <i>Inter-Marketing Group USA Inc. v. CenturyLink, Inc.</i> | 17-cv-8234        | U.S.D.C. S.D.N.Y. | 0:18-cv-0299      |

Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

In this securities class action, the names and state residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of the claims of class members residing in each state to the entire settlement. Class members who properly submit claims forms and supporting documentation will receive their *pro rata* share of the net settlement fund. It is not feasible to provide the names of all class members who reside in each state. **28 U.S.C. § 1715(b)(7).**



There are no written judicial opinions relating to the materials described under subparagraphs (3) through (6) of the notice statute. **28 U.S.C. § 1715(b)(8).**

If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Treg Taylor  
Alaska Attorney General  
1031 West 4th Ave., Suite 200  
Anchorage, AK 99501-1994  
(907) 269-5100

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

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If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs".

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



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+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Mark Brnovich  
Arizona Attorney General  
2005 North Central Ave.  
Phoenix, AZ 85004-2926  
(602) 542-5025

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
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Sincerely,

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Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
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Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Leslie Rutledge  
Arkansas Attorney General  
323 Center St., Ste. 200  
Little Rock, AR 72201-2610  
(800) 482-8982

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Patrick E. Gibbs  
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pgibbs@cooley.com

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By Overnight Delivery

February 9, 2021

CAFA Coordinator  
Office of the Attorney General  
Consumer Law Section  
455 Golden Gate Ave., Suite 11000  
Sacramento, CA 94102  
(916) 324-5437

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Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

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The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

In this securities class action, the names and state residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of the claims of class members residing in each state to the entire settlement. Class members who properly submit claims forms and supporting documentation will receive their *pro rata* share of the net settlement fund. It is not feasible to provide the names of all class members who reside in each state. **28 U.S.C. § 1715(b)(7).**



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If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
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Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Phil Weiser  
Colorado Attorney General  
1300 Broadway, 10th fl.  
Denver, CO 80203  
(720) 508-6000

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

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Sincerely,

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Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
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Fax: (650) 849-7400



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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

William Tong  
Connecticut Attorney General  
165 Capitol Ave.  
Hartford, CT 06106  
(860) 808-5318

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
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Patrick E. Gibbs  
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Phone: (650) 843-5000  
Fax: (650) 849-7400





Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Karl Racine  
District of Columbia Attorney General  
Columbia  
400 6th St., NW  
Washington, DC 20001  
(202) 727-3400

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
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Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Kathy Jennings  
Delaware Attorney General  
820 North French Street  
Wilmington, DE 19801  
(302) 577-8400

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Patrick E. Gibbs  
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pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Ashley Moody  
Florida Attorney General  
The Capitol, Plaza Level One  
Tallahassee, FL 32399-1050  
(850) 245-0140

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| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn. (MDL Proceeding) | MDL No. 17-2795   |
| <i>Craig v. CenturyLink, Inc.</i>                                  | 18-cv-00296       | U.S.D.C. S.D.N.Y.                  | 0:18-cv-0296      |
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There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

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There are no written judicial opinions relating to the materials described under subparagraphs (3) through (6) of the notice statute. **28 U.S.C. § 1715(b)(8).**

If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
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Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Chris Carr  
Georgia Attorney General  
40 Capitol Square, SW  
Atlanta, GA 30334-1300  
(404) 483-2477

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

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Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Clare E. Connors  
Hawaii Attorney General  
425 Queen Street  
Honolulu, HI 96813  
(808) 586-1282

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
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Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

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Phone: (650) 843-5000  
Fax: (650) 849-7400



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pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Lawrence Wasden  
Idaho Attorney General  
P.O. Box 83720  
Boise, ID 83720-0010  
(208) 334-2400

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Kwame Raoul  
Illinois Attorney General  
100 West Randolph Street  
Chicago, IL 60601  
(312) 814-3000

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Todd Rokita  
Indiana Attorney General  
302 W. Washington St., 5th floor  
Indianapolis, IN 46204  
(317) 232-6201

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

| Case Name  | Original Case No. | Original Court                     | D. Minn. Case No. |
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| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn. (MDL Proceeding) | MDL No. 17-2795   |
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Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

In this securities class action, the names and state residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of the claims of class members residing in each state to the entire settlement. Class members who properly submit claims forms and supporting documentation will receive their *pro rata* share of the net settlement fund. It is not feasible to provide the names of all class members who reside in each state. **28 U.S.C. § 1715(b)(7).**



There are no written judicial opinions relating to the materials described under subparagraphs (3) through (6) of the notice statute. **28 U.S.C. § 1715(b)(8).**

If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
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Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Tom Miller  
Iowa Attorney General  
1305 E. Walnut St.  
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(515) 281-5164

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
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Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



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pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Derek Schmidt  
Kansas Attorney General Office  
120 SW 10th Ave., 2nd fl.  
Topeka, KS 66612-1597  
(785) 296-2215

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Cooley LLP  
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Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Daniel Cameron  
Kentucky Attorney General  
700 Capitol Ave., Suite 118  
Frankfort, KY 40601  
(502) 696-5300

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Patrick E. Gibbs  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Jeff Landry  
Louisiana Attorney General  
P.O. Box 94005  
Baton Rouge, LA 70804  
(225) 326-6000

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If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs".

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
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Patrick E. Gibbs  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Aaron Frey  
Maine Attorney General  
State House Station 6  
Augusta, ME 04333-0006  
(207) 626-8800

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

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Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Brian Frosh  
Maryland Attorney General  
200 St. Paul Place  
Baltimore, MD 21202  
(410) 576-6300

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Fax: (650) 849-7400



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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Maura Healey  
Massachusetts Attorney General  
One Ashburton Place  
Boston, MA 02108-1518  
(617) 727-2200

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Dana Nessel  
Michigan Attorney General  
G. Mennen Williams Building  
P.O. Box 30212  
Lansing, MI 48909  
(517) 335-7622

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Keith Ellison  
Suite 102, State Capital  
75 Dr. Martin Luther King, Jr. Blvd.  
Saint Paul, MN 55155  
(651) 296-3353

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There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

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Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
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Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Lynn Fitch  
Mississippi Attorney General  
P.O. Box 220  
Jackson, MS 39205  
(601) 359-3680

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

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Cooley LLP  
3175 Hanover Street  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Eric Schmitt  
Missouri Attorney General  
207 W. High St.  
Jefferson City, MO 65101  
(573) 751-3321

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Austin Knudsen  
Montana Attorney General  
215 N. Sanders  
Helena, MT 59620-1401  
(406) 444-2026

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Doug Peterson  
Nebraska Attorney General  
Office of the Attorney General  
345 State Capitol  
Lincoln, NE 68509  
(402) 471-2683

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Aaron Ford  
Nevada Attorney General  
100 North Carson Street  
Carson City, NV 89701  
(775) 684-1100

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| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn. (MDL Proceeding) | MDL No. 17-2795   |
| <i>Craig v. CenturyLink, Inc.</i>                                  | 18-cv-00296       | U.S.D.C. S.D.N.Y.                  | 0:18-cv-0296      |
| <i>Scott v. CenturyLink, Inc.</i>                                  | 3:17-cv-01005     | U.S.D.C. W.D. La.                  | 0:18-cv-0297      |
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| <i>Inter-Marketing Group USA Inc. v. CenturyLink, Inc.</i> | 17-cv-8234        | U.S.D.C. S.D.N.Y. | 0:18-cv-0299      |

Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

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If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
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Palo Alto, California 94304-1130  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Gordon MacDonald  
New Hampshire Attorney General  
New Hampshire Dept. of Justice  
33 Capitol Street  
Concord, NH 03301  
(603) 271-3658

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

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Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Gurbir Grewal  
New Jersey Attorney General  
RJ Hughes Justice Complex  
25 Market Street, Box 080  
Trenton, NJ 08625-0080  
(609) 292-4925

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Fax: (650) 849-7400





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By Overnight Delivery

February 9, 2021

Hector Balderas  
New Mexico Attorney General  
P.O. Drawer 1508  
Santa Fe, NM 87504-1508  
(505) 490-4060

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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February 9, 2021

Letitia A. James  
Office of the New York Attorney General  
Dept. of Law – The Capitol, 2nd fl.  
Albany, NY 12224  
(800) 771-7755

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February 9, 2021

Joshua Stein  
North Carolina Attorney General  
Dept. of Justice  
P.O. Box 629  
Raleigh, NC 27602-0629  
(919) 716-6400

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We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

| Case Name  | Original Case No. | Original Court                        | D. Minn. Case No. |
|--|-------------------|---------------------------------------|-------------------|
| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn.<br>(MDL Proceeding) | MDL No. 17-2795   |
| <i>Craig v. CenturyLink, Inc.</i>                                  | 18-cv-00296       | U.S.D.C. S.D.N.Y.                     | 0:18-cv-0296      |
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Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

In this securities class action, the names and state residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of the claims of class members residing in each state to the entire settlement. Class members who properly submit claims forms and supporting documentation will receive their *pro rata* share of the net settlement fund. It is not feasible to provide the names of all class members who reside in each state. **28 U.S.C. § 1715(b)(7).**





There are no written judicial opinions relating to the materials described under subparagraphs (3) through (6) of the notice statute. **28 U.S.C. § 1715(b)(8).**

If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs".

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Wayne Stenehjem  
North Dakota Attorney General  
600 East Boulevard Avenue, Dept. 125  
Bismarck, ND 58505  
(701) 328-2210

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

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Sincerely,

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Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



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+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Dave Yost  
Ohio Attorney General  
30 East Broad Street, 14th fl.  
Columbus, OH 43215  
(800) 282-0515

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Cooley LLP  
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Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Michael Hunter  
Oklahoma Attorney General  
313 NE 21st St.  
Oklahoma City, OK 73105  
(405) 521-3921

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Ellen F. Rosenblum  
Oregon Attorney General  
1162 Court St., NE  
Salem, OR 97301-4096  
(503) 378-4400

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Cooley LLP  
3175 Hanover Street  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Joshua Shapiro  
Pennsylvania Attorney General  
1600 Strawberry Square  
Harrisburg, PA 17120  
(717) 787-3391

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

| Case Name  | Original Case No. | Original Court                     | D. Minn. Case No. |
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| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn. (MDL Proceeding) | MDL No. 17-2795   |
| <i>Craig v. CenturyLink, Inc.</i>                                  | 18-cv-00296       | U.S.D.C. S.D.N.Y.                  | 0:18-cv-0296      |
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Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

In this securities class action, the names and state residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of the claims of class members residing in each state to the entire settlement. Class members who properly submit claims forms and supporting documentation will receive their *pro rata* share of the net settlement fund. It is not feasible to provide the names of all class members who reside in each state. **28 U.S.C. § 1715(b)(7).**



There are no written judicial opinions relating to the materials described under subparagraphs (3) through (6) of the notice statute. **28 U.S.C. § 1715(b)(8).**

If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

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February 9, 2021

Peter Neronha  
Rhode Island Attorney General  
150 South Main Street  
Providence, RI 02903  
(401) 274-4400

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February 9, 2021

Alan Wilson  
South Carolina Attorney General  
P.O. Box 11549  
Columbia, SC 29211  
(803) 734-3970

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February 9, 2021

Jason Ravensborg  
South Dakota Attorney General  
1302 East Highway 14, Ste. 1  
Pierre, SD 57501-8501  
(605) 773-3215

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Herbert Slatery III  
Tennessee Attorney General  
425 5th Avenue North  
Nashville, TN 37243  
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Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Ken Paxton  
Texas Attorney General  
P.O. Box 12548  
Austin, TX 78711-2548  
(512) 463-2100

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

The Consolidated Class Action Complaint is enclosed with this notice in Appendix 1. The complaints filed prior to consolidation are available online at [www.pacer.gov](http://www.pacer.gov), associated with their respective case numbers, as set forth below. If you would also like a set of pleadings sent to you via CD or SFTP, please contact Bryan Koch at [bkoch@cooley.com](mailto:bkoch@cooley.com). **28 U.S.C. § 1715(b)(1).**

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Phone: (650) 843-5000  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Monty Wilkinson  
Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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Phone: (650) 843-5000  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Sean Reyes  
Utah Attorney General  
P.O. Box 142320  
Salt Lake City, UT 84114-2320  
(801) 366-0260

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

TJ Donovan  
Vermont Attorney General  
109 State Street  
Montpelier, VT 05609-1001  
(802) 828-3171

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Mark Herring  
Virginia Attorney General  
202 North Ninth Street  
Richmond, VA 23219  
(804) 786-2071

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Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

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There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

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If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs".

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Bob Ferguson  
Washington Attorney General  
1125 Washington St. SE  
P.O. Box 40100  
Olympia, WA 98504-0100  
(360) 753-6200

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

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Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
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+1 650 843 5535  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Patrick Morrissey  
West Virginia Attorney General  
State Capitol Complex  
Bldg. 1, Room E-26  
Charleston, WV 25305  
(304) 558-2021

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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Josh Kaul  
Wisconsin Attorney General  
P.O. Box 7857  
Madison, WI 53707-7857  
(608) 266-1221

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Bridget Hill  
Wyoming Attorney General  
Kendrick Building  
2320 Capitol Avenue  
Cheyenne, WY 82002  
(307) 777-7841

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
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February 9, 2021

Leevin Taitano Camacho  
Guam Attorney General  
Office of the Attorney General Guam  
590 South Marine Corps Drive, Suite 901  
Tamuning, GU 96913  
(671) 475-3324

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|--|-------------------|---------------------------------------|-------------------|
| <i>In re CenturyLink Sales Practices and Securities Litigation</i> | N/A               | U.S.D.C. D. Minn.<br>(MDL Proceeding) | MDL No. 17-2795   |
| <i>Craig v. CenturyLink, Inc.</i>                                  | 18-cv-00296       | U.S.D.C. S.D.N.Y.                     | 0:18-cv-0296      |
| <i>Scott v. CenturyLink, Inc.</i>                                  | 3:17-cv-01005     | U.S.D.C. W.D. La.                     | 0:18-cv-0297      |





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| <i>Thummeti v. CenturyLink, Inc.</i>                       | 17-cv-4695        | U.S.D.C. S.D.N.Y. | 0:18-cv-0298      |
| <i>Inter-Marketing Group USA Inc. v. CenturyLink, Inc.</i> | 17-cv-8234        | U.S.D.C. S.D.N.Y. | 0:18-cv-0299      |

Also enclosed with this notice in **Appendix 2** are copies of plaintiffs' motion for preliminary approval of the proposed settlement and supporting memorandum and documents, including the Stipulation and Agreement of Settlement (Ex. 1), and the proposed Notice, Proof of Claim and Release Form, and Summary Notice (Exs. A-1, A-2, and A-3), which are subject to court approval and further changes. These documents notify the class members of the proposed settlement of the class action and the settlement fairness hearing, briefly explain the process of requesting exclusion from the settlement, and explain how to obtain further information about the settlement. There is currently no final class action settlement. **28 U.S.C. §§ 1715(b)(3), (4).**

The hearing on the motion for preliminary approval is presently scheduled for April 7, 2021, in Courtroom 13E, before the Honorable Michael J. Davis at the U.S. District Court for the District of Minnesota, 200 South Fourth Street, Minneapolis, MN 55415. Given the ongoing COVID-19 pandemic, we also expect arrangements to be made for remote attendance. A final approval hearing has not yet been scheduled. The hearing date, time, and location are subject to change. **28 U.S.C. § 1715(b)(2).**

The Parties have also entered into a separate confidential agreement, called the "Supplemental Agreement" and referred to in Paragraph 37 of the Stipulation and Agreement of Settlement (Ex. 1), which provides that Defendants shall have the right to terminate the settlement in the event that requests for exclusion from the settlement exceed certain agreed-upon criteria. This agreement remains confidential and has not been included with the documents. Should you require additional information about the Supplemental Agreement, please contact me, and we will coordinate with counsel for the Parties to make all reasonable efforts to address those questions, subject to the confidentiality provision. **28 U.S.C. § 1715(b)(5).**

There is no final judgment yet. The proposed Final Approval Order and Final Judgment, which will be subject to court approval, are enclosed (see Exs. A and B). **28 U.S.C. § 1715(b)(6).**

In this securities class action, the names and state residences of the class members will not be known until after notice of the settlement is given and potential class members submit claim forms, so it is not feasible at this time to provide a list of class members by state of residence, a reasonable estimate of the number of class members residing in each state, or a reasonable estimate of the proportionate share of the claims of class members residing in each state to the entire settlement. Class members who properly submit claims forms and supporting documentation will receive their *pro rata* share of the net settlement fund. It is not feasible to provide the names of all class members who reside in each state. **28 U.S.C. § 1715(b)(7).**



There are no written judicial opinions relating to the materials described under subparagraphs (3) through (6) of the notice statute. **28 U.S.C. § 1715(b)(8).**

If you have questions about this notice, the enclosures, the above-referenced action, the settlement, or if you did not receive any of the above-listed materials, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pat Gibbs", is positioned above the typed name.

Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
Fax: (650) 849-7400



Patrick E. Gibbs  
+1 650 843 5535  
pgibbs@cooley.com

CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Edward Manibusan  
N. Mariana Islands Attorney General  
Caller Box 10007  
Saipan, MP 96950-8907  
(670) 664-2341

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
Civil Action No. 18-296 (MJD/KMM), United States District Court, District of  
Minnesota**

Dear Madam or Sir:

We write on behalf of CenturyLink, Inc., which recently changed its name to Lumen Technologies, Inc. (“CenturyLink”), Glen F. Post, III, Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey, the Defendants in the above-referenced action. We hereby provide your office with this notice under the provisions of the Class Action Fairness Act (“CAFA”), 28 U.S.C. § 1715, to advise you of a proposed class action settlement between Defendants and the Plaintiffs in the above-referenced action. On February 1, 2021, Plaintiffs in the above-referenced action filed a proposed Stipulation and Agreement of Settlement and motion for preliminary approval of class action settlement. The court has not yet ruled on the motion nor taken any other action with regard to the proposed settlement. In accordance with 28 U.S.C. § 1715(b), CenturyLink states as follows:

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Patrick E. Gibbs  
Cooley LLP  
3175 Hanover Street  
Palo Alto, California 94304-1130  
Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
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CONFIDENTIAL  
By Overnight Delivery

February 11, 2021

Domingo Emanuelli Hernández  
Puerto Rico Secretary of Justice  
Departamento de Justicia  
P.O. Box 9020192  
San Juan, PR 00902-0192  
(787) 721-2900

**Re: Notice of Proposed Class Action Settlement Under 28 U.S.C. § 1715  
*In re CenturyLink Sales Practices & Securities Litig.*, No. 17-md-02795-MJD-KMM/  
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Phone: (650) 843-5000  
Fax: (650) 849-7400





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CONFIDENTIAL  
By Overnight Delivery

February 9, 2021

Denise George  
Attorney General of the Virgin Islands  
Dept. of Justice  
Office of the Attorney General  
3438 Kronprinsdens Gade  
GERS Bldg., 2nd fl.  
St. Thomas, VI 00802  
(340) 774-5666 x10107

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Email: [pgibbs@cooley.com](mailto:pgibbs@cooley.com)  
Phone: (650) 843-5000  
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# EXHIBIT 2

**From:** ATG MI WA CAFA-PrivateCP Lawsuits <[privatecpa@ATG.WA.GOV](mailto:privatecpa@ATG.WA.GOV)>

**Sent:** Friday, February 12, 2021 1:59 PM

**To:** Gibbs, Patrick <[pgibbs@cooley.com](mailto:pgibbs@cooley.com)>

**Subject:** RE: Matter # 10911331, In re CenturyLink Sales Practices & Securities Litigation

[External]

---

**Sent on behalf of Assistant Attorney General Amy Teng:**

Dear Counsel:

This message acknowledges that we have received notice from you regarding the above mentioned case pursuant to the Class Action Fairness Act of 2005, 28 U.S.C § 1715 (CAFA).

Thank you for bringing this matter to the attention of the Washington State Attorney General's Office, Consumer Protection Division.

Sincerely,

**Kristina Winfield**

Legal Assistant

Consumer Protection Division

Office of the Attorney General

800 5th Avenue, Suite 2000

Seattle, WA 98104